IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

KEITH COLE, JACKIE BRANNUM,	§	
RICHARD KING, FRED WALLACE,	§	
LAVAR SANTEE, and MARVIN RAY	§	
YATES, individually and on behalf of	§	
those similarly situated,	§	
Plaintiffs,	§	
	§	
V.	§	CIVIL ACTION NO. 4:14-CV-1698
	Š	
	8	
BRYAN COLLIER, in his official	8	
capacity, ROBERTO HERRERA, in his	§	
official capacity, and TEXAS	8	
DEPARTMENT OF CRIMINAL	\$ \$	
JUSTICE,	8	
Defendants.	§	
V	3	

DEFENDANTS' THIRD VERIFIED STATUS REPORT REGARDING AIR CONDITIONING AT TDCJ FACILITIES HOUSING CLASS MEMBERS: SEPTEMBER 29, 2020

KEN PAXTON	TED A. ROSS
Attorney General of Texas	Assistant Attorney General
	Attorney-in-Charge
JEFFREY C. MATEER	State Bar No. 24008890
First Assistant Attorney General	Southern District ID No. 22658
	Ted.Ross@oag.texas.gov
RYAN L. BANGERT	
Deputy First Assistant Attorney General	CHARLES K. ELDRED
	State Der No. 00702691

State Bar No. 00793681

DARREN L. McCarty

Deputy Attorney General for Civil Litigation

State Bar No. 00793681

Special Litigation Counsel

BENJAMIN DOWER
SHANNA E. MOLINARE
Chief, Law Enforcement Defense Division

BENJAMIN DOWER
State Bar No. 24082931
Assistant Attorney General

Office of the Attorney General

P.O. Box 12548

Austin, Texas 78711-2548

512-463-2080 • fax 512-370-9069

JEANINE COGGESHALL

State Bar No. 24083162

Assistant Attorney General

Defendants, Bryan Collier and Robert Herrera, in their official capacities, and the Texas Department of Criminal Justice (Defendants), by and through the Office of the Attorney General, file this Second Verified Status Report Regarding Air Conditioning at TDCJ Facilities Housing Class Members. Included with this court filing are the verified temperature logs from June 19, 2020 to August 23, 2020 and August 24, 2020 to August 31, 2020, for all locations within TDCJ where class members may be housed.

Dated: September 29, 2020.

Respectfully Submitted,

KEN PAXTON

Attorney General of Texas

JEFFREY C. MATEER

First Assistant Attorney General

RYAN L. BANGERT

Deputy First Assistant Attorney General

DARREN McCARTY

Deputy Attorney General for Civil Litigation

SHANNA E. MOLINARE

Division Chief Law Enforcement Defense Division

/s/ Ted A. Ross

TED A. ROSS

State Bar No. 24008890 Assistant Attorney General

CHARLES K. ELDRED

State Bar No. 00793681 Special Litigation Counsel

BENJAMIN DOWER

State Bar No. 24082931 Assistant Attorney General

JEANINE COGGESHALL

State Bar No. 24083162 Assistant Attorney General

Office of the Attorney General of Texas P. O. Box 12548, Capitol Station Austin, Texas 78711 P: (512) 475-4191 F: (512) 457-4674 Ted.Ross@oag.texas.gov Charles.Eldred@oag.texas.gov Benjamin.Dower@oag.texas.gov Jeanine.Coggeshall@oag.texas.gov

ATTORNEYS FOR DEFENDANTS

NOTICE OF ELECTRONIC FILING

I, Ted A. Ross, Assistant Attorney General of Texas, do hereby certify that I have electronically submitted for filing, a correct copy of the foregoing in accordance with the Electronic Case Files System of the Southern District of Texas, on September 29, 2020

/s/ Ted. A. Ross
Ted A. Ross
Assistant Attorney General

CERTIFICATE OF SERVICE

I, Ted A. Ross, Assistant Attorney General of Texas, do hereby certify that a true and correct copy of the above and foregoing has been served on all counsel of record via electronic mail on September 29, 2020, as authorized by Fed. R. Civ. P. 5(b)(2) and in accordance with the electronic case filing procedures of the United States District Court for the Southern District of Texas.

/s/ Ted. A. Ross
Ted A. Ross
Assistant Attorney General